

1 Thomas A. Ericsson, Esq.
ORONOS & ERICSSON, LLC
2 Nevada Bar No. 4982
1050 Indigo Drive, Suite 120
3 Las Vegas, Nevada 89145
Phone: (702) 878-2889
4 tom@oronozlawyers.com
Attorney for Defendant Arnold
5

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 EDWIN ARNOLD,

12 Defendant.

Case No. 2:17-cr-00042-APG-DJA

STIPULATION TO CONTINUE
SENTENCING

(Second Request)

13 IT IS HEREBY STIPULATED AND AGREED by and between the United States
14 of America, through Shaheen Torgoley and Allison Reese, Assistant United States
15 Attorneys, together with Thomas Ericsson, counsel for Defendant Edwin Arnold, that
16 the sentencing hearing currently scheduled for November 10, 2021 be vacated and set
17 to a date and time convenient to this Court, but no sooner than 30 days from the
18 current sentencing date. (Defense counsel is unavailable during the week of December
19 6-10, 2021.)

20 This stipulation is entered into for the following reasons:

- 21 1. The Defendant is in custody and does not object to the continuance.
- 22 2. On November 9, 2021, Defendant requested that he be allowed to attend his
- 23 sentencing in person. The COVID-19 safety protocols at the Pahrump
- 24 detention facility require inmates to be quarantined at least 14 days prior to

1 appearing in court. The current sentencing date does not provide sufficient
2 time for Mr. Arnold's required quarantine period.

3
4 3. Additionally, denial of this request for continuance could result in a
5 miscarriage of justice.

6 4. The additional time requested by this Stipulation is made in good faith and
7 not for purposes of undue delay.

8 5. This is the second request for a continuance of the sentencing hearing.

9 DATED this 2nd day of November, 2021.

10 /s/ Thomas A. Ericsson
11 Thomas A. Ericsson, Esq.
12 Counsel for Defendant Arnold

13 /s/ Shaheen Torgoley
14 /s/ Allison Reese
15 Shaheen Torgoley, Esq.
16 Allison Reese, Esq.
17 Counsel for the United States
18
19
20
21
22
23
24

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:17-cr-00042-APG-DJA

Plaintiff,

ORDER

vs.

EDWIN ARNOLD,

Defendant.

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the Defendants the right to appear in person for his sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that sentencing in the above-captioned matter currently scheduled for November 10, 2021, be vacated and continued to January 11, 2022, at 9:00 a.m. in Las Vegas Courtroom 6C.

DATED: November 3, 2021


THE HONORABLE ANDREW P. GORDON
U.S. DISTRICT COURT JUDGE